



ATTORNEYS AT LAW

Chrysler Building
405 Lexington Avenue | 36th Floor
New York, New York 10174-0002
212.430.5500 | fax 212.430-5501
www.carltonfields.com

Atlanta
Hartford
Los Angeles
Miami
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New Jersey
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Tampa
Washington, DC
West Palm Beach

MEMO ENDORSED

Michael D. Margulies
Shareholder
212.430.5511 Direct Dial
mmargulies@carltonfields.com

January 17, 2025

Via ECF

Hon. Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *SecurityScorecard, Inc. v. Safe Securities, Inc., et al.*,
Case No.: 1:24-cv-04240-ER

Dear Judge Ramos:

We are counsel for plaintiff, SecurityScorecard, Inc. ("SSC") and write to request a brief adjournment of the telephonic conference presently scheduled for January 21, 2025 at 10:30 a.m. in the above-referenced matter. Carlton Fields has just been retained and is substituting as lead counsel for SSC. A brief, two-week adjournment of the conference is requested to afford sufficient time for counsel to be brought up to speed. There has been no previous request for an adjournment of this conference.

On January 16, 2025, we conferred with counsel for defendant Safe Securities, Inc. ("SAFE") and sought their consent for the requested adjournment. We also informed SAFE's counsel that we are available to further meet and confer during an adjournment period to attempt to narrow the disputed discovery issues before appearing before the Court. Though counsel has yet to respond as to whether SAFE consents to the requested adjournment, we are filing this letter today to bring this matter to the Court's attention before the Monday, January 20 Court holiday.

We appreciate your consideration of this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "M. Margulies", written over a horizontal line.

Michael D. Margulies

Cc: All counsel of record (by ECF)

The telephonic pre-motion conference is adjourned to February 5, 2025, at 2:30 p.m. The parties are reminded to call (855) 244-8681; enter access code 2301 087 7354#; and enter # again when asked to enter the attendee ID number. The parties are further instructed to join the call five (5) minutes prior to the conference's start time.
SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: 1/17/2025

New York, New York